

**REMARKS**

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for considering the present application.

**Disposition of Claims**

Claims 1-13 were pending in the referenced application. By way of this reply, claims 14-24 have been added and claims 1-13 have been cancelled, without prejudice or disclaimer. Accordingly, claims 14-24 are now pending in the referenced application. Claims 14 and 21-23 are independent. The remaining claims depend, directly or indirectly, from independent claims 14 and 23.

**Claim Amendments**

New claims 14-24 include limitations similar to originally filed claims 1-6, 8-11, and 13, respectively. Support for the aforementioned amendments is present, for example, in the originally filed claims. No new matter has been added by any of the aforementioned amendments.

**Drawings**

The drawings were objected to for failing to show every feature of the invention specified in the claims. However, 37 CFR § 1.83(a), as cited by the Examiner, specifically requires that any *structural detail that is essential for a proper understanding* of the disclosed invention should be shown in the drawing. (See Office Action mailed on January 29, 2007, p. 3). Said another way, 37 CFR § 1.83(a) does not require *every element referred to in the claims* be shown.

The Applicant respectfully asserts that the specification adequately describes the elements of the claimed invention and, accordingly, a graphical depiction of the elements in the drawings is not required. In view of the above, the Applicant asserts that the drawings, as pending, satisfy the drawing requirements of the rules outlined in the C.F.R. Accordingly, withdrawal of the objection is respectfully requested.

### **Amendments to the Specification**

The specification has been amended to address the objections outlined on pages 5-7 of the Office Action mailed on January 29, 2007. Accordingly, withdrawal of this objection is respectfully requested.

### **Claim Objections**

Claims 1-2 and 8-11 were objected to for including informalities. As discussed above, claims 1-2 and 8-11 have been cancelled thereby rendering the objections moot. Accordingly, withdrawal of the objections is respectfully requested.

### **Rejections under 35 U.S.C. §101**

Claims 1-7 and 10-13 stand rejected under 35 U.S.C. § 101 for failing to recite statutory subject matter. As discussed above, claims 1-7 and 10-13 have been cancelled thereby rendering the rejection moot. Accordingly, withdrawal of this rejection is respectfully requested.

**Rejections under 35 U.S.C. §112**

Claims 1-13 stand rejected under 35 U.S.C. § 112, first paragraph, for failing to comply with the enablement requirement. As discussed above, claims 1-13 have been cancelled thereby rendering the rejection moot. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 1-10 and 13 stand rejected under 35 U.S.C. § 112, second paragraph, as being incomplete for omitting essential steps. Further, claims 1-9 and 13 also stand rejected under 35 U.S.C. § 112, second paragraph, for being indefinite. As discussed above, claims 1-10 and 13 have been cancelled thereby rendering the rejections moot. Accordingly, withdrawal of these rejections is respectfully requested.

**Rejections under 35 U.S.C. § 102**

Claims 1-2 and 7-12 stand rejected under 35 U.S.C. § 102 (e) as being anticipated by U.S. Patent No. 2003/0037020 ("Novak"). Claims 1-2 and 7-12 have been cancelled by this reply. Thus, this rejection is now moot. Accordingly, withdrawal of this rejection is respectfully requested.

**Rejections under 35 U.S.C. § 103**

Claims 3, 6, and 13 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Novak. Claims 3, 6, and 13 have been cancelled by this reply. Thus, this rejection is now moot. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 4-5 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Novak in view of U.S. Patent No. 6,968,209 ("Ahlgren"). Claims 4-5 have been cancelled by this reply. Thus, this rejection is now moot. Accordingly, withdrawal of this rejection is respectfully requested.

### **New Claims**

As discussed above, new claims 14-24 have been added by way of this reply. Claims 14 and 21-23 are independent. Further, new claims 15-21 depend, directly or indirectly, from new claim 14 and, claim 24 depends from new claim 23.

New claims 14-24 are patentable over the cited references for at least the following reasons. Specifically, new claims 14-24 are directed to embodiments in which a removable device (*e.g.*, SIM Card) synchronizes a first database (*e.g.*, phonebook locally stored on the removable device) with a second database stored in an external device (*e.g.*, PDA), such that the removable device manages its own modifications (*i.e.*, as opposed to management by a mobile phone). In particular, in one or more embodiments of the claimed invention, in order to synchronize both databases, the removable device supplies a synchronization object that represents a specific state of the first database and indicates whether synchronization has previously occurred with the second database. Further, the removable device supplies the identifiers for any modifications, additions, or deletions to records in the database since the last successful synchronization (*e.g.*, with the second database) to facilitate the synchronization (*i.e.*, instead of the mobile phone indicating the changes needed). Further, *only* the changed identifiers are transmitted for synchronization, rather than each and every record for comparison. (*see e.g.*, Published Specification, paragraphs [0031]-[0045]).

In contrast, the cited references fail to disclose, teach, or suggest storing a synchronization object associated with the first database in a memory of a removable subscriber identity module that indicates a state of the first database before any further modifications to the first database are performed. Specifically, the cited portion of Novak (*i.e.*, paragraphs [0030]-[0032], discloses that “when the database is modified (*e.g.*, a record is added, deleted or modified), a new checksum is calculated, and ...stored and used to aid in tracking changes to the database in the memory 180.” (*see* Novak, paragraph [0030]). The Applicant respectfully asserts that the memory 180, as shown in Figure 4 of Novak, is part of the mobile phone memory (*i.e.*, not located in the SIM card). Said another way, Novak discloses that the checksum is calculated and stored outside of the SIM card. Thus, Novak is completely silent with respect to a removable subscriber identity module that may be configured to generate a synchronization object *inside* the removable subscriber identity module.

Further, Ahlgren does not supply that which Novak lacks. Specifically, while Ahlgren discussed synchronization of databases (*see, e.g.*, Ahlgren, Figure 2), there is no mention in Ahlgren that any data associated with the synchronization (*e.g.*, a synchronization object) could be stored inside the SIM card. In fact, Ahlgren, as evidenced by the following, specifically teaches away from storing a synchronization object inside the SIM card.

Unfortunately, although this improves the synchronization process, adding the change logs introduces another problem. Since memory on the SIM card 50 is limited, it is likely that the change log will be stored in another memory device in the mobile phone 20, *e.g.*, local RAM (not shown), rather than on the SIM card 50 itself, as is the database. (Ahlgren, col 2, ll 31-36).

In view of the above, the cited references, whether considered separately or in

combination, fail to teach or suggest the claimed invention.

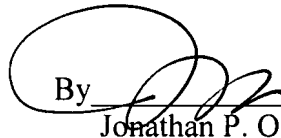
Moreover, new claims 14-24 comply with the requirements of 35 U.S.C. § 101 and 35 U.S.C. § 112, first and second paragraphs. Specifically, the new claims clarify that a synchronization object is created by, and stored in, a memory of the removable subscriber identity module. Further, the new claims address the issues raised by the Examiner on pages 9-12 of the Office Action mailed on January 29, 2007. In view of the above, new claims 14-24 are believed to overcome all of the Examiner's original concerns, as claims 14-24 are directed to statutory subject matter, produce a tangible result, include all essential steps, and are definite. Accordingly, a favorable action in the form of a Notice of Allowance is respectfully requested for new claims 14-24.

**Conclusion**

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number [09669/046001]).

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Respectfully submitted,

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